

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

ROCCO CIOFOLETTI, on behalf of
themselves and all others similarly
situated,

Plaintiff,

-vs-

SECURIAN FINANCIAL GROUP, INC.,
MINNESOTA LIFE INSURANCE
COMPANY, SECURIAN LIFE
INSURANCE COMPANY and
MINNESOTA MUTUAL COMPANIES,
INC.,

Defendants.

Case No.: 18-cv-03025-JNE-ECW

LARRY STOSPAL, on behalf of
themselves and all others similarly
situated,

Plaintiff,

-vs-

SECURIAN FINANCIAL GROUP, INC.,
MINNESOTA LIFE INSURANCE
COMPANY, SECURIAN LIFE
INSURANCE COMPANY and
MINNESOTA MUTUAL COMPANIES,
INC.,

Defendants.

Case No.: 18-cv-03047-JNE-ECW

**PLAINTIFFS' MOTION FOR CONSOLIDATION OF ACTIONS AND
APPOINTMENT OF INTERIM CO-LEAD COUNSEL**

Pursuant to Fed. R. Civ. 42 (a) and 23 (g), Plaintiffs in the above-captioned Minnesota actions (“Minnesota Actions”) move for entry of an Order consolidating the Minnesota Actions with *Harrison v. Securian Financial Group*, No. 18-CV-3274-JNE-ECW (the “Harrison Action”); and appointing Dan Gustafson of Gustafson Gluek PLLC as Minnesota Interim Co-Lead Counsel, Lee Squitieri of Squitieri & Fearon, LLP, and Kenneth Wexler of Wexler Wallace LLP as additional Interim Co-Lead Counsel (collectively “Interim Co-Lead Counsel”).

Defendants Securian Financial Group, Inc.; Minnesota Life Insurance Company; Securian Life Insurance Company; and Minnesota Mutual Companies, Inc. (collectively “Defendants”) support the motion for consolidation and take no position on the Minnesota Actions Plaintiffs’ proposed appointment of Interim Lead Counsel. The Harrison Action Plaintiff supports consolidation and will separately seek interim leadership for its counsel.

This Motion is based on: (1) the Memorandum of Law in Support of Plaintiffs’ Motion for Consolidation of Actions and Appointment of Interim Co-Lead Counsel; (2) the Declaration of Daniel E. Gustafson in Support of Plaintiffs’ Motion for Consolidation of Actions and Appointment of Interim Co-Lead Counsel and Exhibits; and (3) the Proposed Order, served and filed together with any additional information or argument presented to the Court.

Dated: January 15, 2019

Respectfully submitted,

/s/Daniel E. Gustafson

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***Proposed Interim Co-Lead Counsel and
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